

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KHADIJA TRIBBLE,

Plaintiff,

v.

Civil Action No. 1:24-cv-12760

CURALEAF HOLDINGS, INC. and
MATTHEW DARIN,

Defendants.

**DEFENDANTS' ASSENTED-TO MOTION TO EXTEND THE DEADLINE TO
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Defendants Curaleaf Holdings, Inc., and Matthew Darin (collectively “Defendants”), jointly request the Court grant Defendants an additional week, up to and including January 10, 2025, to file an answer or otherwise respond to Plaintiff’s Complaint. In support of this Motion, Defendants state as follows:

1. On or about October 31, 2024, Plaintiff Khadija Tribble (“Plaintiff”) commenced a civil action against Defendants in this Court.
2. Defendants accepted service of the Complaint on or about November 4, 2024, without waiving any defenses or objections to the lawsuit, the court’s jurisdiction, or the venue of the action.¹
3. The answer or response to the Complaint is currently due on January 3, 2025.

¹ Consistent with the executed waiver of the service of summons, this motion is made without waiver of any defenses or objections to the lawsuit, the court’s jurisdiction, or the venue of the action. Defendants are specifically evaluating whether or not this Court has personal jurisdiction over the individual defendant, Matthew Darin, and reserve all rights to bring such a motion, if appropriate.

4. Defendants have been working diligently to gather information to respond to Plaintiff's Complaint. Due to the holidays, Defendants require a brief extension of time to respond.

5. The granting of this extension will not prejudice the Court or any parties to this action and will not delay the proceedings.

WHEREFORE, Defendants request that they be granted until January 10, 2025, to file a response to Plaintiff's Complaint.

<p>ASSENTED TO BY:</p> <p>PLAINTIFF,</p> <p>KHADIJA TRIBBLE</p> <p>By her attorney,</p> <p><u>/s/ Zachary H. Hammond</u></p> <p>Todd J. Bennett (BBO #643185)</p> <p>Michaela C. May (BBO# 676834)</p> <p>Zachary H. Hammond (BBO# 696465)</p> <p>Bennett & Belfort, P.C.</p> <p>24 Thorndike Street, Ste. 300</p> <p>Cambridge, MA 02141</p> <p>(617)577-8800</p> <p>tbennett@bennettandbelfort.com</p> <p>mmay@bennettandbelfort.com</p> <p>zhammond@bennettandbelfort.com</p>	<p>Defendant,</p> <p>CURALEAF HOLDINGS, INC.</p> <p>By their counsel,</p> <p><u>/s/ Keerthi Sugumaran</u></p> <p>Keerthi Sugumaran (BBO #682822)</p> <p>Keith Taubenblatt (BBO No. 708748)</p> <p>Jackson Lewis P.C.</p> <p>75 Park Plaza</p> <p>Boston, MA 02116</p> <p>(617) 367-0025</p> <p>(617) 367-2155 (fax)</p> <p>Keerthi.Sugumaran@jacksonlewis.com</p> <p>Keith.Taubenblatt@jacksonlewis.com</p>
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Dated: December 30, 2024

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 30, 2024.

/s/ Keerthi Sugumaran
Jackson Lewis P.C.